

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

ROHM AND HAAS ELECTRONIC  
MATERIALS LLC

Plaintiff,

V.

HONEYWELL INTERNATIONAL INC.

Defendant.

Civil Action No. 06-297-GMS

**PLAINTIFF ROHM AND HAAS ELECTRONIC MATERIALS LLC'S  
MOTION TO ENFORCE THE SETTLEMENT AGREEMENT**

Plaintiff Rohm and Haas Electronic Materials LLC (“Rohm and Haas”) hereby  
moves for the following:

- (1) to enforce the agreement with defendant, Honeywell International Inc. (“Honeywell”) to settle this litigation;
- (2) to require Honeywell to execute the July 17, 2007 Confidential Settlement Agreement with Mutual Release and Patent License (“Settlement Agreement”);
- (3) to require the parties to effectuate the Settlement Agreement, including filing the agreed-upon stipulation of dismissal of this case; and
- (4) to award Rohm and Haas its attorneys’ fees and costs associated with bringing this motion.

The grounds of this motion are fully set forth in Plaintiff's concurrently-filed memorandum.

Pursuant to Local Rule 7.1.1, the undersigned counsel conferred with defendant's counsel regarding this Motion. Defendants' counsel has indicated that the defendant will oppose this Motion.

CONNOLLY BOVE LODGE & HUTZ LLP

/s/ Rudolf E. Hutz  
Rudolf E. Hutz (#484)  
Daniel C. Mulveny (#3984)  
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*Attorneys for Plaintiff*

Dated: July 31, 2007  
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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

ROHM AND HAAS ELECTRONIC  
MATERIALS LLC

Plaintiff,

v.

HONEYWELL INTERNATIONAL INC.

Defendant.

Civil Action No. 06-297-GMS

**ORDER GRANTING PLAINTIFF  
ROHM AND HAAS ELECTRONIC MATERIALS LLC'S  
MOTION TO ENFORCE THE SETTLEMENT AGREEMENT**

AND NOW on this \_\_\_\_\_ day of \_\_\_\_\_, 2007, upon  
consideration of plaintiff's motion to enforce the settlement agreement, and any and all  
responses thereto, it is hereby ORDERED that:

- (1) Plaintiff's motion to enforce the agreement with defendant to settle this litigation is GRANTED;
- (2) Within five (5) days of the date of this order, defendant shall execute the July 17, 2007 Confidential Settlement Agreement with Mutual Release and Patent License ("Agreement");
- (3) Upon execution of the Agreement by defendant, the plaintiff and the defendant shall effectuate the Settlement Agreement in accordance with its terms;
- (4) Within ten (10) days of the date that defendant executes the Agreement, the parties shall submit the agreed-upon stipulation of dismissal in this case;
- (5) Plaintiff's request for attorney's fees and costs associated with bringing the motion is GRANTED; and

- (6) Plaintiff shall submit a fee petition within thirty (30) days of the date of this order.

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UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on July 31, 2007, I electronically filed **PLAINTIFF ROHM AND HAAS ELECTRONIC MATERIALS LLC'S MOTION TO ENFORCE THE SETTLEMENT AGREEMENT** with the Clerk of the Court using CM/ECF which will send notification of such filing to the following:

James D. Taylor, Jr.  
Buchanan Ingersoll & Rooney PC  
The Brandywine Building  
1000 West Street, Suite 1410  
Wilmington, DE 19801

I hereby certify that on July 31, 2007, I have mailed by First Class Mail, the document(s) to the following non-registered participant:

Constance S. Huttner  
Buchanan Ingersoll & Rooney PC  
One Chase Manhattan Plaza, 35<sup>th</sup> Floor  
New York, NY 10005-1417

/s/ Rudolf E. Hutz  
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